

EXHIBIT 4

CLERK US DISTRICT COURT
NORTHERN DIST. OF TX
FILED

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

DEPUTY CLERK

GRUPO MÉXICO S.A.B. DE C.V.

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**Misc. Civil Action No.
3:14-MC-00073-G-BH**

Filed Under Seal

GRUPO MÉXICO'S MOTION TO UNSEAL THE CASE

Respectfully submitted,

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Attorneys for Grupo México S.A.B. de C.V.

NOW COMES, GRUPO MÉXICO S.A.B. DE C.V. (“Grupo México”) and files this Motion to Unseal the Case. Grupo México has separately filed a Brief in Support of its Motion to Unseal the Case, which Grupo México incorporates herein by reference.

1. On May 9, 2014, Grupo México filed an *ex parte* application under seal for an order directing discovery in aid of foreign proceeding pursuant to 28 U.S.C. § 1782, Docket No.

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2. On October 27, 2014, the Court granted the *ex parte* application and ordered respondents Highland Capital Management, L. P. (“Highland”) and SAS Asset Recovery, Ltd. (“SAS”) (collectively “the Respondents”), to produce all documents and communications responsive to Grupo México’s subpoenas, Docket No. 5.

3. Grupo México served its subpoenas on October 24, 2014 and November 7, 2014.

4. As further described in the brief filed herewith, the continued sealing of the case is no longer warranted. All parties have been served and are active case participants.

WHEREFORE, Grupo México respectfully requests that the Court grant this motion to unseal the case.

DATED: February 25, 2015

Respectfully submitted,

SIDLEY AUSTIN LLP

By: _____



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CERTIFICATE OF CONFERENCE

I hereby certify to the Court that counsel for the parties have complied with the meet and confer requirement in Local Rule 7.1.

The personal conference required by Local Rule 7.1 was conducted by email on February 24, 2015 between Steven R. Selsberg, on behalf of Grupo México, and Katy Sheppard, on behalf of Highland and SAS. Counsel for Highland and SAS informed counsel for Grupo México that this motion would not be opposed if the parties entered into a confidentiality agreement, and that she would draft one. However, Ms. Sheppard would not commit to a date to produce a draft and the material terms of the confidentiality agreement have not been discussed.



Steven R. Selsberg

CERTIFICATE OF SERVICE

On this 25th day of February, 2015, the foregoing document and its attachments were manually filed with the Clerk of Court, U.S. District Court, for the Northern District of Texas. Service will be made in accordance with Federal Rule of Civil Procedure 5(b)(2) upon counsel for Highland and SAS as follows:

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